

GRANT & EISENHOFER P.A.

Jay W. Eisenhofer
 (jeisenhofer@gelaw.com)
 Geoffrey C. Jarvis (gjarvis@gelaw.com)
 Jeff A. Almeida (jalmeida@gelaw.com)
 485 Lexington Avenue, 29th Floor
 New York, NY 10017
 Telephone: (646) 722-8500
 Facsimile (646) 722-8501

KESSLER TOPAZ MELTZER & CHECK LLP

Stuart L. Berman (sberman@ktmc.com)
 Johnston de F. Whitman, Jr. (jwhitman@ktmc.com)
 280 King of Prussia Road
 Radnor, PA 19087
 Telephone: (610) 667-7706
 Facsimile: (610) 667-7056

SAIBER LLC

Jeffrey W. Lorell (jwl@saiber.com)
 Marc E. Wolin (mew@saiber.com)
 18 Columbia Turnpike, Suite 200
 Florham Park, NJ 07932-2266
 Telephone: (973) 622-3333
 Facsimile: (973) 622-3349

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEW JERSEY**

IN RE MERCK & CO., INC. SECURITIES, DERIVATIVE & "ERISA" LITIGATION	:	MDL No. 1658 (SRC)
	:	
	:	Case No. 2:05-CV-2367-SRC-CLW
THIS DOCUMENT RELATES TO:	:	
The Stichting Pensioenfonds ABP Matter,	:	
Case No. 05-cv-5060	:	
The Norges Bank v. Merck & Co., Inc. Matter	:	
Case No. 07-cv-4021	:	
The Deka Investment GmbH Matter	:	
Case No. 07-cv-4022	:	
The Union Asset Management Holding AG Matter	:	
Case No. 07-cv-4023	:	
The AFA Livförsäkringsaktiebolag Matter	:	
Case No. 07-cv-4024	:	
The Allianz Global Investors	:	
Kapitalanlagegesellschaft mbH Matter	:	
Case No. 07-cv-4551	:	
The Pioneer Investments Kapitalanlagegesellschaft	:	
Matter	:	
Case No. 07-cv-4546	:	

**DECLARATION OF CAITLIN MOYNA IN SUPPORT OF APPLICATION FOR
 ADMISSION *PRO HAC VICE***

CAITLIN MOYNA, ESQ., of full age, hereby declares as follows:

1. I am an attorney with the law firm of Grant & Eisenhofer P.A., 485 Lexington Avenue, 29th Floor, New York, NY 10017. I am not under suspension or disbarment in any jurisdiction or court.

2. I submit this Declaration in support of the application by plaintiffs Stichting Pensioenfonds ABP; Norges Bank; Deka Investment GmbH, Deka International S.A. Luxemburg; International Fund Management S.A.; Metzler Investment GmbH; Union Asset Management Holding AG; Oppenheim Kapitalanlagegesellschaft mbH; Oppenheim Asset Management Services S.à.r.l.; Erste-Sparinvest Kapitalanlagegesellschaft m.b.H.; AFA Livförsäkringsaktiebolag; AFA Trygghetsförsäkringsaktiebolag; AFA Sjukförsäkringsaktiebolag; AFA Sjukförsäkringsaktiebolag on behalf of Kollektivavtalsstiftelsen Trygghetsfonden TSL; Alecta Pensionsförsäkring, Ömsesidigt; Fjärde AP-Fonden; Sjunde AP-Fonden; Danske Invest Management A/S; Swedbank Robur Fonder AB; AMF Pension Fondförvaltning AB; Arbetsmarknadsförsäkringar Pensionsförsäkringsaktiebolag; Skandinaviska Enskilda Banken AB; Skandinaviska Enskilda Banken AB on behalf of SEB Investment Management AB; SEB Asset Management S.A.; Gamla Livförsäkringsaktiebolag SEB Trygg Liv; Pioneer Investments Kapitalanlagegesellschaft mbH; Wiener Stadtische Versicherung AG Vienna Insurance Group; Landesbank Berlin Investment GmbH; KBC Asset Management NV; Pioneer Investment Management LTD.; Pioneer Investment Management SGRpa; and Pioneer Investments Austria GmbH (collectively, "Plaintiffs") to permit me to appear and participate *pro hac vice*, as counsel for Plaintiffs at pre-trial proceedings and at trial of the above-captioned action.

3. I am duly admitted and currently in good standing to practice law in the following jurisdictions, for which I list my year of admission and the address of the official or office maintaining the roll of such members of its bar:

New York (2003)	New York State Unified Court System Office of Court Administration Attorney Registration Unit 25 Beaver Street – Room 840 New York, NY 10004
United States District Court for the Southern District of New York (2007)	Clerk's Office Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

4. I practice in the area of securities litigation and am familiar with this matter.

5. I am associated in this matter with Marc E. Wolin, a member of Saiber LLC, who is the attorney of record for Plaintiffs, is authorized to practice law in New Jersey, and is a member in good standing of the bar of this Court.

6. Upon being admitted to appear and participate in this matter *pro hac vice*, I will abide by the requirements found in Local Civil Rule 101.1.

7. Upon being admitted to appear and participate in this matter *pro hac vice*, I shall promptly make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Rule 1:28-2(a), for any year in which I continue to appear in this matter.

8. Upon being admitted to appear and participate in this matter *pro hac vice*, I shall also promptly make payment to the Clerk of the United States District Court for the District of New Jersey as provided by Local Civil Rule 101.1(c)(3).

9. I also understand that upon admission *pro hac vice*, I am subject to the orders and amenable to disciplinary action and the civil jurisdiction of this Court and the New Jersey State

Bar in all respects as if I were regularly admitted and a licensed member of the Bar of the State of New Jersey in good standing. I agree to notify the Court immediately of any matter affecting my standing at the bar of any other Court.

10. For the foregoing reasons, it is respectfully requested that the Court grant Plaintiffs' application to have me admitted *pro hac vice* to appear and participate as counsel in this matter pursuant to Local Civil Rule 101.1(c).

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 30, 2013


Caitlin Moyna